

# **Modern Slavery Policy**

This policy was approved by the Managing Director of Redfields Landscaping & Design Ltd. (the Company) and applies to the Company.

#### Who must comply with this policy

This policy applies to all persons working for the Redfields Landscaping & Design Ltd or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors and sub-contractors, external consultants, third party representatives, or any other person associated with the Redfields Landscaping & Design Ltd. In this policy, all such persons will be referred to as "you".

## About this policy

The purpose of this policy is to set out the Redfields Landscaping & Design Ltd's commitment to mitigating the risk of any modern slavery, forced labour and human trafficking (together, Modern Slavery) in the Redfields Landscaping & Design Ltd.

Please note that you may also want to refer to the following Redfields Landscaping & Design Ltd policies:

Anti-bribery and Corruption Policy Whistleblowing Policy

This policy does not form part of any employee's contract of employment, and the Redfields Landscaping & Design Ltd reserves the right to amend it at any time in its sole discretion.

The Company's legal advisors have overall responsibility for ensuring this policy complies with our legal obligations. The Procurement Department has primary responsibility for auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery in our supply chain. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy, and are given adequate and regular training on it and the issue of Modern Slavery, where required.

### **Preventing Modern Slavery**

Modern Slavery can take various forms, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The following list provides some examples of Modern Slavery (but please note that this is not an exhaustive list):

- Failing to pay employees and workers in accordance with the applicable national minimum wage;
- Making any unlawful deductions from employee's wages;
- Requiring employees to work excessive hours which do not conform to local or national laws;
- Forcing employees to work overtime, or any other form of forced, non-voluntary work;
- Failing to provide a suitable and safe working environment for employees;
- Employing workers who are under the legal minimum age of employment.

Redfields Landscaping & Design Ltd is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our operations.



We are also committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains. We require the same high standards from all of our contractors, suppliers and other stakeholders.

The prevention, detection and reporting of Modern Slavery in any part of Redfields Landscaping & Design Ltd.'s business or supply chains is the responsibility of all those working for Redfields Landscaping & Design Ltd. or under our control. You are therefore required to avoid any activity that might lead to, or suggest, a breach of this policy.

#### Reporting concerns about Modern Slavery

You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chains at the earliest possible stage. If you believe or suspect a breach of this policy has occurred, or may occur, you must notify a Director (or in the case of third parties, your normal Redfields Landscaping & Design Ltd contact) or report it in accordance with our Whistleblowing Policy as soon as possible. If you are unsure about whether a particular act, matter or issue constitutes Modern Slavery, but remain concerned that it may represent a breach of this policy, please still report it in the same way.

Redfields Landscaping & Design Ltd encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Redfields Landscaping & Design Ltd guarantees that no one will suffer any detrimental treatment as a result of reporting, in good faith, their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

#### Breaches of this policy

Any employee who breaches this policy may face disciplinary action. We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

#### Review of this Policy and Version Control

This policy will be reviewed by the Redfields Landscaping & Design Ltd on at least an annual basis to ensure it is up to date and achieving its aims.

**Andy Pearce** 

**Managing Director** 

Redfields Landscaping and Design Ltd.

December 2023

#### **CHANGE HISTORY**

Issue	Date	Author	Change Detail	
1	27/02/2019	Mark Wilson	VPS Issue	
2	01/04/2022	Tony Mann	Review for systems Audit	
3	01/08/2023	Cassie Shaw	Review	
4	11/12/2023	Cassie Shaw	Amended	